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5 Attorneys for Defendants COUNTY OF LOS ANGELES  
6 (additionally and erroneously sued and served as "LOS  
7 ANGELES COUNTY + UNIVERSITY OF CALIFORNIA  
8 MEDICAL CENTER"), LOS ANGELES COUNTY SHERIFF  
9 DEPARTMENT, UNIVERSITY OF SOUTHERN  
10 CALIFORNIA, JOHN L. SCOTT, ARTHUR PRYOR, M.D.,  
11 and ROLAND VALENZUELA, M.D.

12 **UNITED STATES DISTRICT COURT**

13 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

14 **JEFFREY KOVACS,**

15 Plaintiff,

16 v.

17 COUNTY OF LOS ANGELES, a  
18 public entity; LOS ANGELES  
19 COUNTY + UNIVERSITY OF  
20 SOUTHERN CALIFORNIA  
21 MEDICAL CENTER, a public entity;  
22 LOS ANGELES COUNTY SHERIFF  
23 DEPARTMENT, a public entity; CITY  
24 OF LOS ANGELES, an incorporated  
25 municipality; LOS ANGELES POLICE  
26 DEPARTMENT, a department of the  
27 City of Los Angeles; UNIVERSITY OF  
28 SOUTHERN CALIFORNIA, a private  
university; JOHN L. SCOTT, as an  
individual and in his official capacity;  
CHARLES L. BECK, as an individual  
and in his official capacity; ARTHUR  
PRYOR, as an individual and in his  
official capacity; ROLAND  
VALENZUELA, as an individual and  
in his official capacity; DOES 1 through  
50, Inclusive,

**Defendants.**

Case No. 2:15-cv-04557 SVW (PJWx)  
[District Judge Stephen V. Wilson;  
Magistrate Judge Patrick J. Walsh]

**STIPULATION FOR DISMISSAL  
WITH PREJUDICE AS TO  
ALL CLAIMS OF PLAINTIFF  
JEFFREY KOVACS AGAINST  
DEFENDANTS COUNTY OF LOS  
ANGELES, LOS ANGELES  
COUNTY + UNIVERSITY OF  
SOUTHERN CALIFORNIA  
MEDICAL CENTER, LOS  
ANGELES COUNTY SHERIFF'S  
DEPARTMENT, UNIVERSITY OF  
SOUTHERN CALIFORNIA,  
SHERIFF JOHN L. SCOTT,  
DR. ARTHUR PRYOR, and  
DR. ROLAND VALENZUELA**

**Pursuant to Fed. R.Civ.P 41  
(a)(1)(A)(ii)**

Complaint Filed: 4/16/15  
Answer Filed: 6/11/15

1 TO THE HONORABLE COURT:

2 IT IS HEREBY STIPULATED, by and between plaintiff JEFFREY  
3 KOVACS ("plaintiff") and defendants COUNTY OF LOS ANGELES, LOS  
4 ANGELES COUNTY + UNIVERSITY OF SOUTHERN CALIFORNIA  
5 MEDICAL CENTER, LOS ANGELES COUNTY SHERIFF'S DEPARTMENT,  
6 UNIVERSITY OF SOUTHERN CALIFORNIA, SHERIFF JOHN L. SCOTT, DR.  
7 ARTHUR PRYOR, and DR. ROLAND VALENZUELA, by and through their  
8 respective attorneys of record, that defendants COUNTY OF LOS ANGELES, LOS  
9 ANGELES COUNTY + UNIVERSITY OF SOUTHERN CALIFORNIA  
10 MEDICAL CENTER, LOS ANGELES COUNTY SHERIFF'S DEPARTMENT,  
11 UNIVERSITY OF SOUTHERN CALIFORNIA, SHERIFF JOHN L. SCOTT, DR.  
12 ARTHUR PRYOR, and DR. ROLAND VALENZUELA ("defendants") be  
13 dismissed with prejudice from this action by plaintiff pursuant to Fed. R. Civ.P  
14 41(a)(1)(A)(ii).

15 IT IS HEREBY FURTHER STIPULATED, by and between plaintiff and  
16 defendants, that this dismissal constitutes a general mutual release of all claims and  
17 a mutual waiver of all costs, court fees, and attorneys' fees arising out of this  
18 litigation between these aforementioned parties.

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1 It is further agreed by and between the parties that this stipulation may be  
2 signed in counterpart and that a facsimile or electronic signature will be as valid as  
3 an original signature.

4 IT IS SO STIPULATED.

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6 Dated: December 6, 2016

**CALLAHAN, THOMPSON, SHERMAN &  
CAUDILL, LLP**

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9 By: /s/ Lee A. Sherman

10 Lee A. Sherman, Esq.  
11 Attorneys for Plaintiff  
12 JEFFREY KOVACS

13 Dated: December 6, 2016

**MANNING & KASS  
ELLROD, RAMIREZ, TRESTER LLP**

14  
15  
16 By: /s/ Mildred K. O'Linn

17 Mildred K. O'Linn, Esq.  
18 Attorneys for Defendants  
19 COUNTY OF LOS ANGELES  
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21 served as "LOS ANGELES COUNTY +  
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23 MEDICAL CENTER"), LOS ANGELES  
24 COUNTY SHERIFF DEPARTMENT,  
25 UNIVERSITY OF SOUTHERN  
26 CALIFORNIA, JOHN L. SCOTT,  
27 ARTHUR PRYOR, M.D., and ROLAND  
28 VALENZUELA, M.D.

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